

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address

☐ Individual appearing without attorney
☒ Attorney for: Carolyn A. Dye, Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

Debtor(s).

CHAPTER: 7

NOTICE OF SALE OF ESTATE PROPERTY

Time: 10:30 am

Location: 255 E. Temple Street, Courtroom 1339, Los Angeles, CA 90012

Last date to file objections: 08/26/2014

See Notice of Motion for Sale attached hereto as Exhibit "A."

See Notice of Motion for Sale attached hereto as Exhibit "A."

F 6004-2.NOTICE.SALE

Overbid procedure (if any):

See Notice of Motion for Sale attached hereto as Exhibit "A."

If property is to be sold free and clear of liens or other interests, list date, time and location of hearing:

September 9, 2014 at 10:30 a.m. in Courtroom 1339 of the Roybal Federal Building located at 255 E. Temple Street, Los Angeles, CA 90012.

Contact person for potential bidders (include name, address, telephone, fax and/or email address):

Christian T. Kim
Dumas & Associates
3435 Wilshire Boulevard, Suite 990
Los Angeles, CA 90010
(t) 213-368-5000
(f) 213-368-5009
ckim@dumas-law.com

Date: 08/18/2014

EXHIBIT “A”

EXHIBIT “A”

James A. Dumas (SBN 76284)
Christian T. Kim (SBN 231017)
DUMAS & ASSOCIATES
3435 Wilshire Blvd., Suite 990
Los Angeles, California 90010
Phone: 213-368-5000
Fax: 213-368-5009

Attorneys for Chapter 7 Trustee,
Carolyn A. Dye

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re

FREMONT INVESTMENT HOLDINGS, INC.,

Debtor.

Case No. 2:11-bk-31045-DS

[Chapter 7]

[Honorable Deborah Saltzman]

**NOTICE OF TRUSTEE'S MOTION FOR
ORDER AUTHORIZING SALE OF
PROPERTY OF THE ESTATE FREE AND
CLEAR OF LIENS AND ENCUMBRANCES
SUBJECT TO HIGHER AND BETTER
OFFERS, AND APPROVING
OVERBIDDING PROCEDURES**

Date: September 9, 2014

Time: 10:30 a.m.

**Place: Courtroom 1339
Roybal Federal Building
255 E. Temple Street
Los Angeles, CA 90012**

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**TO THE HONORABLE DEBORAH SALTZMAN, UNITED STATES BANKRUPTCY
COURT JUDGE, THE DEBTOR AND HIS COUNSEL, THE UNITED STATES
TRUSTEE AND ALL CREDITORS AND INTERESTED PARTIES:**

PLEASE TAKE NOTICE that on September 9, 2014 at 10:30 a.m. a hearing will be held in Courtroom 1339 before the Honorable Deborah Saltzman, United States Bankruptcy Judge, in the United States Bankruptcy Court located at 255 E. Temple Street, Los Angeles, California to consider the motion of the Chapter 7 Trustee herein, Carolyn A. Dye ("Trustee"), for an order authorizing the sale and assignment of three separate judgments entered in the adversary proceedings, Carolyn A. Dye v. Robert Gray (2:13-ap-01479-PC) in the amount of \$46,000, Carolyn A. Dye v. Fabio Perez (2:13-ap-01481-PC) in the amount of \$30,400, and, Carolyn A. Dye v. Patton Door Service, Inc., et. al. (2:13-ap-01482-PC) in the amount of \$48,633.17 (collectively the "Adversary Proceedings") for a total sale price of \$5,000 and subject to overbids as follows:

1. Minimum Overbids. The initial minimum overbid for the judgments in the Adversary Proceedings shall be \$1,000 above the present offer and any subsequent overbids shall be at least \$500 over the preceding offer.

2. Minimum Deposits. A deposit of \$5,000, plus the initial overbid of \$1,000, or a total of \$6,000, must accompany any overbid offer for the Judgments and in the form of a cashier's check made payable to "Carolyn A. Dye ATF Fremont Investment Holdings, Inc." Overbidders are requested to submit to the Trustee a cashier's check for the required deposit by no later than 48 hours before the hearing date.

3. The overbidding party will be bound by all of the terms of sale proposed in the Purchase and Sale Agreement attached to the Trustee's Motion for Sale and the overbidder's

1 deposit is nonrefundable.

2 You may request a complete copy of the Motion from:

3
4 Christian T. Kim
5 Dumas & Associates
6 Counsel for the Trustee
7 3435 Wilshire Boulevard, Suite 990
8 Los Angeles, CA 90010

9 A complete copy of the Motion is also on file with the Clerk of the Court and may be viewed at
10 the United States Bankruptcy Court, 255 E. Temple Street, Room 940, Los Angeles, CA 90012.

11 PLEASE TAKE FURTHER NOTICE that any objection to the Motion or the proposed
12 sale must be made in writing and filed with the Court no later than fourteen (14) days prior to the
13 hearing in conformity with Local Bankruptcy Rule 9013-1(f), and consist of a written statement
14 of all reasons in opposition, an answering Memorandum of Points and Authorities, declarations,
15 and documentary evidence on which the responding party intends to rely.

16
17 PLEASE TAKE FURTHER NOTICE that pursuant to Local Bankruptcy Rule 9013(h),
18 any objection not timely filed and served may be deemed by the Court to be consent to the relief
19 requested and may result in the Court's issuance of an order without further notice or hearing.

20
21 Dated: August 18, 2014

DUMAS & ASSOCIATES

22
23 By: 

24 Christian T. Kim, Attorneys for the
25 Chapter 7 Trustee, Carolyn A. Dye

26 Service Date: August 18, 2014
27
28

Main Document Page 7 of 10	
In re: Fremont Investment Holdings, Inc. aka Fremont Investment Funding	CHAPTER: 7
Debtor(s).	CASE NUMBER: 2:11-bk-31045-DS

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 3435 Wilshire Blvd., Ste. 990, Los Angeles, CA 90010.

A true and correct copy of the foregoing document entitled (specify): Notice of Trustee's Motion for Order Authorizing Sale of Property of the Estate Free and Clear of Liens and Encumbrances Subject to Higher and Better Offers, and Approving Overbidding Procedures will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) August 18, 2014 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

James A Dumas jdumas@dumas-law.com
 Carolyn A Dye (TR) trustee@cadye.com, cdye@ecf.epiqsystems.com;atty@cadye.com
 Baruch C Cohen bcc4929@gmail.com
 United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
 David S Hagen go4broq@earthlink.net
 Christian T. Kim ckim@dumas-law.com
 Miri Kim mkim@dumas-law.com, miri.l.kim@gmail.com

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) August 18, 2014 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Debtor- Fremont Investment Holdings, Inc.,
 8052 Melrose Avenue 2nd Floor
 Los Angeles, CA 90046

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) August 18, 2014, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

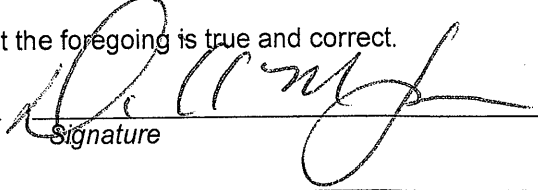
US Bankruptcy Court
 Honorable Deborah Saltzman
 255 E. Temple St., Crt. Rm 1339
 Los Angeles, CA 90010

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 18, 2014
 Date

Danielle M. Landeros
 Printed Name


 Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

Label Matrix for local noticing
0973-2
Case 2:11-bk-31045-DS
Central District Of California
Los Angeles
Mon Aug 18 12:37:17 PDT 2014

Dumas & Associates
3435 Wilshire Blvd., Ste. 990
Los Angeles, CA 90010-1998

Fremont Investment Holdings, Inc., a Califor
8052 Melrose Avenue 2nd Floor
Los Angeles, CA 90046-7015

LEA Accountancy, LLP
3435 Wilshire Boulevard Suite 990
Los Angeles, CA 90010-1998

United States Trustee (LA)
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017-3560

Los Angeles Division
255 East Temple Street,
Los Angeles, CA 90012-3332

Artin Gholian
8052 Melrose Ave 2nd Flr
Los Angeles CA 90046-7015

Bankruptcy Section MS A340
Franchise Tax Board
PoBox 2952
Sacramento CA 95812-2952

Baruch C Cohen
Law Office of Baruch C Cohen
4929 Wilshire Boulevard Suite 940
Los Angeles CA 90010-3889

(p)CHASE CARD SERVICES
201 NORTH WALNUT STREET
ATTN MARK PASCALE
MAIL STOP DE1-1406
WILMINGTON DE 19801-2920

David M Decastro
5850 Canoga Avenue 4th Floor
Woodland Hills CA 91367-6554

FRANCHISE TAX BOARD
BANKRUPTCY SECTION MS A340
PO BOX 2952
SACRAMENTO CA 95812-2952

Fremont Investment Holdings Inc
8052 Melrose Avenue 2nd Floor
Los Angeles CA 90046-7015

(p)INTERNAL REVENUE SERVICE
CENTRALIZED INSOLVENCY OPERATIONS
PO BOX 7346
PHILADELPHIA PA 19101-7346

Joey D. Ball
Paul C. Bauducco, Esq.
16633 Ventura Blvd 11th Flr.
Encino CA 91436-1801

Nicholas Kanter Esq
Lewitt Hackman Shapiro Mars
16633 Ventura Boulevard 11th Floor
Encino CA 91436-1801

Peter Gordon
8050 Melrose Avenue 2nd Floor
Los Angeles CA 90046-7015

Peter Gordon
8052 Melrose Avenue 2nd Floor
Los Angeles CA 90046-7015

Securities Exchange Commission
5670 Wilshire Boulevard 11th Floor
Los Angeles CA 90036-5627

United States Trustee
725 South Figueroa Street 26th Floor
Los Angeles CA 90017-5413

Victor Huezo
9401 Wayside Drive
Sunland CA 91040-1758

Baruch C Cohen
4929 Wilshire Blvd Ste 940
Los Angeles, CA 90010-3889

Carolyn A Dye (TR)
Law Offices of Carolyn Dye
3435 Wilshire Blvd, Suite 990
Los Angeles, CA 90010-1998

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Chase
PO Box 15919
Wilmington DE 19850-5919

Internal Revenue Service
PO Box 21126
Philadelphia PA 19114

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) FLANS & WEINER, INC.

(u) US Gate Supply Inc

End of Label Matrix	
Mailable recipients	22
Bypassed recipients	2
Total	24

In re: Fremont Investment Holdings, Inc. aka Fremont Investment Funding

CHAPTER: 7

Debtor(s).

CASE NUMBER: 2:11-bk-31045-DS

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I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 3435 Wilshire Blvd., Ste. 990, Los Angeles, CA 90010.

A true and correct copy of the foregoing document entitled (*specify*): **Notice of Sale of Estate Property** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

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 Carolyn A Dye (TR) trustee@cadye.com, cdye@ecf.epiqsystems.com;atty@cadye.com
 Baruch C Cohen bcc4929@gmail.com
 United States Trustee (LA) ustpreion16.la.ecf@usdoj.gov
 David S Hagen go4broq@earthlink.net
 Christian T. Kim ckim@dumas-law.com
 Miri Kim mkim@dumas-law.com, miri.l.kim@gmail.com

☐ Service information continued on attached page

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US Bankruptcy Court
 Honorable Deborah Saltzman
 255 E. Temple St., Crt. Rm 1339
 Los Angeles, CA 90010

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 18, 2014

Danielle M. Landeros

Date

Printed Name

Signature